

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Atty. Docket: STOLTZ11

In re Application of:)	Conf. No.: 8947
)	
Klas STOLTZ)	Art Unit: 3736
)	
Appln. No.: 10/697,943)	Examiner: J.G. Hoekstra
)	
Date Filed or 102(e) date:)	
October 31, 2003)	Washington, D.C.
)	
For: SAMPLING DEVICE AND METHOD)		May 10, 2006
FOR OBTAINING SAMPLES OF)		
INTERNAL SUBSTANCES ...)		

PETITION UNDER 37 C.F.R. §1.182

Honorable Commissioner for Patents
U.S. Patent and Trademark Office
Randolph Building, Mail Stop Petitions
401 Dulany Street
Alexandria, VA 22314

Sir:

Applicant hereby petitions the Patent and Trademark Office to convert the above-identified application from an application filed under 37 C.F.R. §1.53(b) to a national stage application, filed pursuant to 35 U.S.C. §371. As this is a matter not otherwise provided for, this petition is being filed pursuant to 37 C.F.R. §1.182.

STATEMENT OF THE FACTS INVOLVED

As is verified by the declaration of Roger L. Browdy, submitted herewith as Exhibit A, the present application was received in the office of the undersigned under cover of a letter dated October 20, 2003, from the patent office of Dr. Ludwig Brann Patentbyrå AB in Stockholm, Sweden. The letter, of copy of which is submitted herewith as

Exhibit B, clearly states that Browdy and Neimark was requested to take the necessary steps for entry into the national stage in the United States of international application PCT/SE02/00951. The executed declaration that accompanied the letter of October 20, 2003 (copy submitted herewith as Exhibit C), a copy of which was filed on October 31, 2003, with the original filing of the above-identified case, also clearly identifies the application as being the entry into the U.S. national stage of international application PCT/SE02/00951, filed 17 May 2002. Upon receipt of this letter, the case was correctly docketed for the 30-month deadline for filing a national stage application under 35 U.S.C. §371. See the Browdy declaration, Exhibit A.

The present application was filed on October 31, 2003. The transmittal letter accompanying the filing is submitted herewith as Exhibit D. Despite the clear instructions received from the client, the transmittal letter contains no indication that applicant intended the application to be a national stage application filed under 35 U.S.C. §371 of international (PCT) application PCT/SE02/00951, filed 17 May 2002.

The failure in the transmittal letter to designate the filing of October 31, 2003, as a 35 U.S.C. §371 filing was due to unintentional human error. See the declaration of Sheridan Neimark, submitted herewith as Exhibit F, and the Browdy declaration, Exhibit A.

The transmittal letter states that the application was claiming benefit under 35 U.S.C. §119 of the filing date of application no. 01017738-3 in Sweden, filed on May 17, 2001, and claiming the benefit of U.S. provisional application no. 60/301,254, filed June 28, 2001. These benefit claims were also made on the Application Data Sheet (copy submitted herewith as Exhibit E), also filed on October 31, 2003, and on the executed declaration (Exhibit C), also filed with the application on October 31, 2003. The October 31, 2003, filing date was more than a year after both the Swedish priority application filing date and the U.S. provisional application filing date.

The declaration (Exhibit C) filed with the case on October 31, 2003, states on the first page that the application "was/will be filed in the U.S. under 35 U.S.C. §371 by entry into the national stage of an international (PCT) application, PCT/SE02/00951: filed 17 May 2002"

The application was inadvertently filed without drawings, despite the fact that the specification indicates that there are eight figures. This error was not noticed by the Patent and Trademark Office and an official filing receipt was issued. The application was published without drawings (US 2004/0097834). Furthermore, a restriction requirement was mailed on April 18, 2006, without reference to the missing drawings.

POINTS TO BE REVIEWED AND ACTION REQUESTED

It is requested that all of the above facts be reviewed. It is further requested that the error made in the transmittal letter in failing to refer to 35 U.S.C. §371 when filing this case be corrected by converting the application as filed on October 31, 2003, to a national stage application under 35 U.S.C. §371. The declaration is already the correct declaration for a national stage application and identifies the international application of which the present invention was intended to be the national phase. The fee paid was sufficient to cover the fee then in effect under 37 C.F.R. §1.492(a) (as well as the fee under the same rule presently in effect). Accordingly, the requirements of 37 C.F.R. §1.495(b) were satisfied so as to avoid abandonment of the international application.

BRIEF IN SUPPORT

As is clearly set forth in the Statement of Facts above, despite clear instructions, the office of the undersigned erroneously submitted a transmittal letter filing this application as a standard national application under 37 C.F.R. §1.53(b) without advising the Patent and Trademark Office in such transmittal letter that it was intended to be the national stage of PCT/SE02/00951.

The transmittal letter (Exhibit D) filed with this case on October 31, 2003, refers to the benefit applications, which had been claimed by that international application, i.e., Swedish application 01017738-3 of May 17, 2001, and U.S.

provisional application 60/301,254, filed June 28, 2001, and requested benefit of these applications, notwithstanding the fact that, without receiving the intermediate benefit of the international application, the one-year priority period for filing the U.S. application was not met.

Not only was a mistake made in not designating the application as being a national stage application, but a further mistake was made in omitting the formal drawings that were present with the international application when the client's letter of October 20, 2003, was forwarded to us.

The Browdy declaration (Exhibit A) indicates that the paralegal in the department in charge of filing new applications who was responsible for filing the above-identified case on October 31, 2003, was Ms. Jennifer Udezue. Ms. Udezue is no longer an employee of Browdy and Neimark and so it cannot be determined how this mistake was made. Her supervisor, Mr. Gregory Kimmel, is also no longer employed by Browdy and Neimark, so he cannot help determine how the mistake was made. The declaration of Sheridan Neimark (Exhibit F), who signed the transmittal letter of October 31, 2003, indicates that he inadvertently overlooked the errors committed by the paralegal in charge of preparing new applications for filing.

It is believed that both of the errors in filing this application can be corrected by the simple expedient of converting the application as filed on October 31, 2003, to a national stage application, filed under 35 U.S.C. §371. While

the identification of the international application does not appear in the transmittal letter (Exhibit D) or the Application Data Sheet (Exhibit E), it does appear in the declaration (Exhibit C) as filed, and it is believed that the declaration can be considered by the PTO to be the controlling document.

Furthermore, the payment of \$1,276.00 made upon filing of the application (including the deficiency of \$162.00 charged to the deposit account of the undersigned on November 4, 2003) was sufficient to cover the basic national fee as required by 37 C.F.R. §1.495(b)(2) and §1.492(a)(3), which would have been \$1,080.00 as of October 31, 2003, and it is requested that the fee paid on October 31, 2003, be considered to include this basic national fee. It was not sufficient to cover the extra claims fee as well, but this can be corrected by the issuance of a Notice of Missing Parts, which, if timely responded to, will not affect the filing date of the application. Indeed, applicant hereby authorizes that all necessary charges for extra claims fees and multiple dependent claim fee that may be due in this case after conversion to a national stage application, be charged to Deposit Account No. 02-4035 of the undersigned firm. Please take note, however, that applicant hereby claims small entity for this application. Indeed, this application was entitled to small entity status as of its filing. Thus, any such additional fees should be charged at the small entity rate.

It is requested that the specification and drawings as received by the Patent and Trademark Office from the International Bureau be considered the specification, claims and drawings of the present application and that the specification filed on October 31, 2003, be considered only a confirmation copy of the specification. Doing so will correct the error of failure to file drawings in this case. Submitted herewith is a substitute transmittal letter (Exhibit G) as should have been filed on October 31, 2003, including courtesy copy attachments as referred to therein, and a supplemental ADS (Exhibit H). As this is not a revival, the fees in effect at the time of filing should be applicable, and these are indicated in the substitute transmittal letter. If this petition is granted, please substitute the transmittal letter submitted herewith as Exhibit G for that filed October 31, 2003, enter the supplemental ADS (Exhibit H), and act upon this case in accordance therewith.

The undersigned is unaware of any provision of the statutes or regulations that would prohibit this conversion from being made. If this conversion or correction is accepted such that the papers filed on October 31, 2003, are considered to be a filing under 35 U.S.C. §371, then all requirements of 37 C.F.R. §1.495(b) were timely satisfied to avoid abandonment of the international application and no revival of that application is necessary.

As a precaution, also submitted on even date herewith is a conditional petition to revive International

Application No. PCT/SE02/00951, so as to file a new national phase application, along with accompanying documentation. It is being filed immediately in order to comply with the requirement that there be no intentional delay in the filing of same. However, the necessity of the petition to revive will be moot if the present petition is granted. Accordingly, the petition to revive is explicitly being made contingent on the ultimate denial of the present petition. If the present petition is granted, the conditional petition to revive should be disregarded and no fees charged therefor as the international application will not have been abandoned but will survive in the present national stage application. Only if the present petition is ultimately denied should the petition to revive be treated as an active petition for decision.

A response to the restriction requirement of April 18, 2006, is being filed on even date herewith so that no dates are presently running against applicant with respect to this case.

The petition fee for filing a petition under 37 C.F.R. §1.182 of \$400.00 is attached (37 C.F.R. §1.17(f)).

CONCLUSION

Granting of this petition and conversion of the application filed October 31, 2003, to a national stage application filed pursuant to 35 U.S.C. §371, which

In re of Appln. No. 10/697,943

application is the national stage of PCT/SE02/00951, filed May 17, 2002, are earnestly solicited.

Respectfully submitted,

BROWDY AND NEIMARK, P.L.L.C.
Attorneys for Applicant(s)

By /rlb/
Roger L. Browdy
Registration No. 25,618

RLB:rd
Telephone No.: (202) 628-5197
Facsimile No.: (202) 737-3528
G:\BN\B\Bran\STOLTZ11\pto\2006-05-10Petition182.doc

Appln. No. 10/697,943
Petition Dated May 10, 2006

Appendix A

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Atty. Docket: STOLTZ11

In re Application of:)	Conf. No.: 8947
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Klas STOLTZ)	Art Unit: 3736
)	
Appln. No.: 10/697,943)	Examiner: J.G. Hoekstra
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Date Filed or 102(e) date:)	
October 31, 2003)	Washington, D.C.
)	
For: SAMPLING DEVICE AND METHOD)	
FOR OBTAINING SAMPLES OF)	
INTERNAL SUBSTANCES ...)	

DECLARATION OF ROGER L. BROWDY

Honorable Commissioner for Patents
U.S. Patent and Trademark Office
Randolph Building, Mail Stop Petitions
401 Dulany Street
Alexandria, VA 22314

Sir:

I, the undersigned Roger L. Browdy, hereby declare
and state as follows:

I am a partner in the law firm of Browdy and
Neimark, PLLC ("Browdy and Neimark"), and have been a partner
since 1976.

As a partner of Browdy and Neimark I am familiar
with all of its standard practices and protocols, and I am one
of the ultimate custodians of the documents and files thereof.

I have reviewed the Browdy and Neimark file of
application no. 10/697,943. Submitted herewith as Exhibit B

is a copy of a letter received from our client, Dr. Ludwig Brann Patentbyrå AB, on October 20, 2003. This letter bears the Browdy and Neimark receipt date stamp and shows in handwriting thereon the docket number and docketed date placed on the letter by the Browdy and Neimark docketing department. It can be seen that the docket number was STOLTZ=11, and the priority deadline (PDL) was stated as 17 November 2003, which was the 30-month deadline from the original priority date of 17 May 2001. Thus, when the order letter was received, it is apparent that the docketing department recognized that a national stage application was intended with the 30-month deadline being correctly docketed for November 17, 2003.

As can be seen from the client's letter (Exhibit B), the PCT publication number was provided with a statement that a copy would follow by mail, and an executed copy of the declaration for patent application and power of attorney (submitted herewith as Exhibit C) was sent both by mail and by fax.

It is clear to me that there was no ambiguity in the instructions and that Browdy and Neimark had been instructed to enter the national stage for PCT application PCT/SE02/00951.

The Browdy and Neimark file next shows that this application was filed on October 31, 2003, with a transmittal

letter, submitted herewith as Exhibit D, that makes no reference to the international application. However, the declaration (Exhibit C) submitted with the new application on October 31, 2003, did explicitly say that the application was being filed under 35 U.S.C. §371 by entry into the national stage of international (PCT) application PCT/SE02/00951, filed May 17, 2002. Furthermore, it can be seen that the transmittal letter (Exhibit D), the declaration (Exhibit C), and the Application Data Sheet (ADS) filed with the application (submitted herewith as Exhibit E) all claim benefit of Swedish application no. 01017738-3, filed May 17, 2001, and claim the benefit of U.S. provisional application no. 60/301,254, filed June 28, 2001. The transmittal letter (Exhibit D) was signed by Sheridan Neimark, who is also a partner of Browdy and Neimark. A declaration by Mr. Neimark explaining his part in the incorrect filing is submitted herewith as Exhibit F.

It is also apparent from the cover letter that the application was filed without any sheets of drawings, despite the fact that the specification indicates that eight figures should be present.

A further review of the Browdy and Neimark file shows that a filing receipt was mailed by the Patent and Trademark Office (PTO) on February 2, 2004. No communication

was received from the Office of Initial Patent Examination pointing out the fact that the specification refers to a drawing but no drawing was submitted. A notice of publication of application was mailed by the PTO and received at Browdy and Neimark on May 28, 2004, indicating that this application was published as US-2004-0097834-A1 on May 20, 2004. This publication includes no drawings.

The Browdy and Neimark file shows that an official action was issued on April 18, 2006, in the nature of a restriction requirement. There is no mention therein of any informalities with respect to the drawings or the priority request. These informalities were noticed by the Browdy and Neimark docketing department after the restriction requirement of April 18, 2006, was received. The file was then brought to me, and steps were immediately taken to correct the errors that were made when the case was originally filed on October 31, 2003.

While the transmittal letter (Exhibit D) does not indicate who prepared the application for Mr. Neimark's signature, the Browdy and Neimark file shows that the filing of this application was reported to the client on October 31, 2003, and that this letter was typed by "jlu," who is Jennifer Udezue, then a paralegal in the filing department of Browdy and Neimark. It is the practice at Browdy and Neimark that

the person who files the application is the one who drafts the letter to the client reporting the filing of the application. Thus, it is apparent that it was Ms. Udezue who made the errors on the filing of the application. Ms. Udezue is no longer an employee of Browdy and Neimark. However, this is the first instance of this sort that has been brought to our attention of a significant error that was made by Ms. Udezue in the filing of new applications during her employ here. Ms. Udezue's supervisor at the time in question was Mr. Gregory Kimmel. He, too, is no longer employed by Browdy and Neimark.

I hereby further declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

May 10, 2006
Date

/rlb/
Roger L. Browdy

Appln. No. 10/697,943
Petition Dated May 10, 2006

Appendix B



Messrs. Browdy & Neimark, P.L.L.C.
Suite 300
624 Ninth Street, N.W.
WASHINGTON D.C. 20001-5303
USA

STOLTZ=||

DEC 16 2003

Via fax No. 1 202 737 3528 (order letter and forms, 5 pages)
Confirmation by mail (order letter and specification via e-mail)

Stockholm, 20 October 2003

Your ref :
Our ref: P05489US01/ ANH/MR

**New Patent Application in the U.S. corresponding to PCT/SE02/00951
of 17 May 2002
Sampling Device and Method for Obtaining Samples of Internal Body
Substances and Method for Producing a Sampling Device
FÄRGKLÄMMAN AB**

Dear Sirs:

Please take the necessary steps for entry into the national phase in the U.S. of the above-identified international application. The time limit for entry into the national phase expires on **17 November 2003**.

INVENTOR: Mr. Klas Stoltz
Gökvägen 2A
S-133 36 SALTSJÖBADEN
Sweden

APPLICANT: Färgklämman AB
Pyramidbacken 6
S-141 75 HUDDINGE
Sweden

TITLE: Sampling Device and Method for Obtaining Samples of
Internal Body Substances and Method for Producing a
Sampling Device

DR LUDWIG BRANN PATENTBYRÅ AB. Intellectual Property & Law Firm.

Stockholm Office: Box 171 92, SE-104 62 Stockholm, Sweden. Visiting address: Maria Skolgata 83. Tel: +46 (0)8 429 10 00 (Non-Office hours: 429 10 99) Fax: +46 (0)8 429 10 70 (Patents). Fax: +46 (0)8 429 10 80 (Trade Marks). **E-mail:** brann@brann.se

Uppsala Office: Box 1344, SE-751 43 Uppsala, Sweden. Visiting address: Drottninggatan 7. Tel: +46 (0)18 56 89 00. Fax: +46 (0)18 56 89 39

Gävle Office: Box 68, SE-801 02 Gävle, Sweden. Visiting address: N. Skeppsbron 1. Tel: +46 (0)26 18 63 20. Fax: +46 (0)26 18 36 04

Head Office and Seat of the Board: Stockholm. Reg. No. 556483-6210. Members of the Association of Swedish Patent Attorneys. Authorized representatives before the EPO and the OHIM

PRIORITY:

Swedish Patent Application No. 0101738-3 of 17 May 2001; U.S. Provisional Application No. 60/301,254 of 28 June 2001

DOCUMENTS**ENCLOSED:**

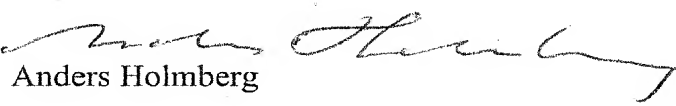
WO 02/102243 A1 (by mail)
International Preliminary Examination Report (by mail)
Declaration for Patent Application and Power of Attorney
(by mail and fax)
Assignment (by mail and fax)

The annuity watch regarding this case will be handled by our service company Patrafee AB, P O Box 9604, S-117 91 Stockholm, Sweden, Tel: +46 8 566 444 00, Fax: +46 8 720 51 72. We kindly ask you to direct all future correspondence concerning annuities to this address.

If any additional information and/or documents are required, please notify us immediately.

Please confirm receipt of this order letter by return fax.

Yours very truly,
DR LUDWIG BRANN PATENTBYRÅ AB


Anders Holmberg

Encls.

Appln. No. 10/697,943
Petition Dated May 10, 2006

Appendix C

Combined Declaration for Patent Application and Power of Attorney

As a below-named inventor, I hereby declare that:

My residence, post office address and citizenship are as stated below next to my name; and that I believe I am the original, first and sole inventor (if only one name is listed below) or an original, first and joint inventor (if plural names are listed below) of the subject matter which is claimed and for which a patent is sought on the invention entitled

SAMPLING DEVICE AND METHOD FOR OBTAINING SAMPLES OF INTERNAL BODY SUBSTANCES AND METHOD FOR PRODUCING A SAMPLING DEVICE

the specification of which (check one)

- [] is attached hereto;
 [] was filed in the United States under 35 U.S.C. §111 on _____, as U.S. Appln. No. _____*; or
 [X] was/will be filed in the U.S. under 35 U.S.C. §371 by entry into the U.S. national stage of an international (PCT) application, PCT/SE02/00951; filed 17 May 2002, entry requested on _____*; national stage application received U.S. Appln. No. _____*; §371/§102(e) date _____* (* if known)

and was amended on _____ (if applicable).
(include dates of amendments under PCT Art. 19 and 34 if PCT)

I have reviewed and understand the contents of the above-identified specification, including the claims, as amended by any amendment referred to above; and I acknowledge the duty to disclose to the Patent and Trademark Office (PTO) all information known by me to be material to patentability as defined in 37 C.F.R. §1.56.

I hereby claim foreign priority benefits under 35 U.S.C. §§ 119 (a)-(d) and 365 (b) of any prior foreign application(s) for patent, inventor's or plant breeder's rights certificate(s), or under §365(a) of any PCT application which designated at least one country other than the U.S., listed below:

Application No.	Country	Filing Date (MM/DD/YYYY)
0101738-3	SE	May 17, 2001

If I claimed foreign priority above, I hereby identify below any foreign application for patent (including an international (PCT) application designating a country other than the United States) or for an inventor's or plant breeder's certificate, having a filing date before that of the earliest application from which foreign priority is claimed (if left blank, then there are none):

Non-Priority Application No.	Country	Filing Date (MM/DD/YYYY)

I hereby claim the benefit under 35 U.S.C. §119(e) of any United States provisional applications listed below:

Application No.	Filing Date (MM/DD/YYYY)
60/301,254	June 28, 2001

I hereby claim the benefit under 35 U.S.C. §120 of any prior U.S. non-provisional application(s) or under §365(c) of any prior PCT international application(s) designating the U.S., listed below and, insofar as the subject matter of each of the claims of this application is not disclosed in such U.S. or PCT international application in the manner provided by the first paragraph of 35 U.S.C. §112, I acknowledge the duty to disclose to the PTO all information which is material to patentability as defined in 37 C.F.R. §1.56 which became available between the filing date of the prior application and the national or PCT international filing date of this application:

Application No.	Filing Date (MM/DD/YYYY)	Status (patented, pending, abandoned)

As a named inventor, I hereby appoint the following registered practitioners to prosecute this application and to transact all business in the Patent and Trademark Office connected therewith:

All of the practitioners associated with Customer Number 001444

Direct all correspondence to the address associated with Customer Number 001444, which is presently:


BROWDY AND NEIMARK, P.L.L.C.
 624 Ninth Street, N.W.
 Washington, D.C. 20001-5303
 (202) 628-5197

Title: SAMPLING DEVICE AND METHOD FOR OBTAINING SAMPLES OF INTERNAL BODY SUBSTANCES AND METHOD FOR PRODUCING A SAMPLING DEVICE

U.S. Application filed _____, Serial No. _____
 PCT Application filed May 17, 2002 _____, Serial No. PCT/SE02/00951

The undersigned hereby authorizes the U.S. Attorneys or Agents appointed herein to accept and follow instructions from DR LUDWIG BRANN PATENTBYRÅ AB as to any action to be taken in the U.S. Patent and Trademark Office regarding this application without direct communication between the U.S. Attorneys or Agents and the undersigned. In the event of a change of the persons from whom instructions may be taken, the U.S. Attorneys or Agents appointed herein will be so notified by the undersigned.

I hereby further declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. §1001 and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

FULL NAME OF FIRST INVENTOR Mr. Klas Stoltz	INVENTOR'S SIGNATURE 	DATE
RESIDENCE SALTSJÖBADEN, Sweden	CITIZENSHIP Swedish	
POST OFFICE ADDRESS Gökvägen 2A, S-133 36 SALTSJÖBADEN, Sweden		
FULL NAME OF SECOND JOINT INVENTOR	INVENTOR'S SIGNATURE	DATE
RESIDENCE	CITIZENSHIP	
POST OFFICE ADDRESS		
FULL NAME OF THIRD JOINT INVENTOR	INVENTOR'S SIGNATURE	DATE
RESIDENCE	CITIZENSHIP	
POST OFFICE ADDRESS		
FULL NAME OF FOURTH JOINT INVENTOR	INVENTOR'S SIGNATURE	DATE
RESIDENCE	CITIZENSHIP	
POST OFFICE ADDRESS		
FULL NAME OF FIFTH JOINT INVENTOR	INVENTOR'S SIGNATURE	DATE
RESIDENCE	CITIZENSHIP	
POST OFFICE ADDRESS		
FULL NAME OF SIXTH JOINT INVENTOR	INVENTOR'S SIGNATURE	DATE
RESIDENCE	CITIZENSHIP	
POST OFFICE ADDRESS		

Appln. No. 10/697,943
Petition Dated May 10, 2006

Appendix D

BROWDY AND NEIMARK, P.L.L.C.

ATTORNEYS AT LAW
PATENT AND TRADEMARK CAUSES

SUITE 300
624 NINTH STREET, N.W.
WASHINGTON, D. C. 20001-5303
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SHERIDAN NEIMARK
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OF COUNSEL
IVER P. COOPER
JAY M. FINKELSTEIN

ALVIN BROWDY (1917-1998)

PATENT AGENT
ALLEN C. YUN, PH.D.

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E-MAIL
mail@browdyneimark.com

October 31, 2003
(Friday)

U.S. Patent and Trademark Office
2011 South Clark Place
Customer Window, Mail Stop Patent Application
Crystal Plaza Two, Lobby, Room 1B03
Arlington, Virginia 22202

Re: New Patent Application in U.S.
Applicant(s): Klas STOLTZ
Title: SAMPLING DEVICE AND METHOD
Atty's Docket: STOLTZ11

Sir:

Attached herewith is the above-identified application for Letters Patent including:

- ☒ Application Data Sheet
- ☒ Specification (10 pages), claims (4 pages) and abstract (1 page)
- ☐ Sheets Drawings (Figures -)
☒ FORMAL ☐ Informal
- ☒ Declaration and Power of Attorney (2 page(s))
☒ Newly executed ☐ Copy from prior application no. _____
- ☐ Preliminary Amendment
☐ Computer-readable Sequence Listing
- ☐ Supplemental Preliminary Amendment
- ☐ Information Disclosure Statement with SB/08A and ____ references
- ☐ Applicant claims small entity status. See 37 C.F.R. §1.27.
- ☐ A check (check no. _____) in the amount of \$_____ to cover:

- ☒ Credit Card Payment Form, PTO-2038, authorizing payment in the amount of \$ 1,114.00 to cover:
☒ The filing fee calculated as follows (including any preliminary amendment for entry prior to calculation of the filing fee):

CLAIMS AS FILED				
FOR	NUMBER FILED	NUMBER EXTRA	RATE	BASIC FEE \$ 770.00
TOTAL CLAIMS	23 20	= 3	x 18	\$54.00
INDEPENDENT CLAIMS	3- 3	= 0	x 86	--
<input checked="" type="checkbox"/> Multiple Dependent Claim Presented			+ 290	\$290.00
<input type="checkbox"/> Reduction of 1/2 for Small Entity				
TOTAL FILING FEE				\$1,114.00

- ☐ Any additional fee required by the filing of an enclosed preliminary or supplemental preliminary amendment (for entry after calculation of the filing fee) has been calculated as shown below:

	CLAIMS REMAINING AFTER AMENDMENT	HIGHEST NO. PREVIOUSLY PAID FOR	PRESENT EXTRA	RATE	CALCULATION
TOTAL		-	=	x 18	
INDEP.		-	=	x 86	
<input type="checkbox"/> Multiple Dependent Claim Presented				+ 290	
<input type="checkbox"/> Reduction by 1/2 for Small Entity					
Total Additional Fee =					

- ☐ Other Fees: _____
☐ Other Attachments: _____
☒ Return Receipt Postcard (in duplicate)

The following statements are applicable:

- ☐ Applicant hereby requests that this application **not** be published pursuant to 35 U.S.C. §122(a). It is certified on behalf of applicant that the invention disclosed in the application has not been and will not be the subject of an application filed in another country, or under a multilateral international agreement, that requires publication of applications 18 months after filing.

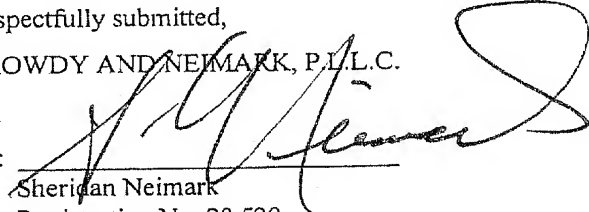
- [X] The benefit under 35 USC §119 is claimed of the filing date of:
Application No. 01017738-3 in Sweden on 17 May 2001. A certified copy of said priority document [] is attached [] was filed in progenitor case _____ on .
Application No. _____ in _____ on _____. A certified copy of said priority document [] is attached [] was filed in progenitor case _____ on _____.
- [X] The present application claims the benefit of U.S. Provisional Appln. No. 60/301,254 filed 28 June 2001.
- [] The present application is a [] Continuation [] Division [] Continuation-in-Part of prior Application No. _____, filed _____. Although this application is stated to be a CIP, applicant does not necessarily concede that any matter is presented in this application which is not present in the parent.
- [] Amend the specification by inserting before the first line the sentence:
[] --This is a continuation/division/continuation-in-part of copending parent application Serial No. _____, filed _____.--
[] --The present application claims the benefit of U.S. Provisional Appln. No. 60/_____, filed _____.--
[] --The present application is the national stage under 35 U.S.C. §371 of international application _____ which designated the United States[, which international application was published under PCT Article 21(2) in English].--
- [X] The application is (or will be) assigned to: FÄRGKLÄMMAN AB whose address is Pyramidbacken 6, S-141 75 Huddinge, Sweden.
- [] Incorporation By Reference. The entire disclosure of the prior application, from which a copy of the oath or declaration is supplied herewith, is considered as being part of the disclosure of the accompanying application and is hereby incorporated by reference therein.
- [] A signed statement deleting inventor(s) named in the prior application is attached.
- [] Certain documents were previously cited or submitted to the Patent and Trademark Office in the following prior application _____, which is relied upon under 35 USC §120. Applicants identify these documents by attaching hereto a form PTO-1449 listing these documents, and request that they be considered and made of record in accordance with 37 CFR §1.98(d). Per Section 1.98(d), copies of these documents need not be filed in this application.
- [] As in the parent application _____, please associate the present application with Customer No. **001444** and recognize only the practitioners associated therewith.
- [X] The Commissioner is hereby authorized to charge payment of the following additional fees associated with this communication or credit any overpayments to Deposit Account No. 02-4035:
[X] Any additional filing fees required under 37 CFR §1.16.
[X] Any patent application processing fees under 37 CFR §1.17.
- [X] The Commissioner is hereby authorized to charge payment of the following fees, based on any paper filed during the pendency of this application or any CPA thereof, to effect any amendment, petition, or other action requested in said paper or credit any overpayments to Deposit Account No. 02-4035:
[X] Any patent application processing fees under 37 CFR §1.17.
[] The issue fee set in 37 CFR §1.18 at or before mailing the Notice of Allowance, pursuant to 37 CFR §1.311(b).

- ☒ Any filing fees under 37 CFR §1.16 for presentation of extra claims.
- ☒ If a paper is untimely filed in this or any CPA thereof by Applicant(s), the Commissioner is hereby petitioned under 37 CFR. §1.136(a) for the minimum extension of time required to make said paper timely. In the event a petition for extension of time is made under the provisions of this paragraph, the Commissioner is hereby requested to charge any fee required under 37 CFR §1.17 to Deposit Account 02-4035.
- ☒ The Commissioner is hereby authorized to credit any overpayment of fees accompanying this paper to Deposit Account No. 02-4035.

Respectfully submitted,

BROWDY AND NEIMARK, P.L.L.C.

By:


Sheridan Neimark

Registration No. 20,520

G:\BN\B\Bran\STOLTZ11\pto\new application transmittal.doc

Appln. No. 10/697,943
Petition Dated May 10, 2006

Appendix E

Application Data Sheet

Application Information

Application Type::	Regular
Subject Matter::	Utility
Suggested Classification::	
Suggested Group Art Unit::	
CD-ROM or CD-R?::	None
Number of CD Disks::	
Number of Copies of CDs::	
Sequence Submission?::	
Computer Readable Form (CRF)?::	
Number of copies of CRF::	
Title::	SAMPLING DEVICE AND METHOD FOR OBTAINING SAMPLES OF INTERNAL BODY SUBSTANCESAND METHOD FOR PRODUCING A SAMPLING DEVICE
Attorney Docket Number::	STOLTZ11
Request for Early Publication?::	No
Request for Non-Publication?::	No
Suggested Drawing Figure::	
Total Drawing Sheets::	0
Small Entity?::	No
Latin Name::	
Variety Denomination Name::	
Petition Included::	No
Petition Type::	
Licensed US Govt. Agency::	
Contract or Grant Numbers::	
Secrecy Order in Parent Appl.?::	No
Applicant Information	
Applicant Authority Type::	Inventor
Primary Citizenship Country::	Sweden

Status:: Full Capacity
 Given Name:: Klas
 Middle Name::
 Family Name:: STOLTZ
 Name Suffix::
 City of Residence:: Saltsjobaden
 State or Province of Residence::
 Country of Residence:: Sweden
 Street of Mailing Address:: Gokvagen 2A
 City of Mailing Address:: Saltsjobaden
 State or Province of Mailing Address::
 Country of Mailing Address:: Sweden
 Postal or Zip Code of Mailing Address:: S-133 36

Correspondence Information

Correspondence Customer Number:: 001444

Representative Information

Representative Customer Number:: 001444

Domestic Priority Information

Application::	Continuity Type::	Parent	Parent Filing
		Application::	Date::
This Application	Appln claiming benefit under 35 USC 119(e)	60/301,254	06/28/01

Foreign Priority Information

Country::	Application Number::	Filing Date::	Priority Claimed::
Sweden	0101738-3	05/17/01	Yes

Assignment Information

Assignee Name:: FARGKLAMMAN AB
 Street of Mailing Address:: Pyramidbacken 6
 City of Mailing Address:: Huddinge
 State or Province of Mailing Address::

Country of Mailing Address::	Sweden
Postal or Zip Code of Mailing Address::	S-141 75

Appln. No. 10/697,943
Petition Dated May 10, 2006

Appendix F

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Atty. Docket: STOLTZ11

In re Application of:)	Conf. No.: 8947
)	
Klas STOLTZ)	Art Unit: 3736
)	
Appln. No.: 10/697,943)	Examiner: J.G. Hoekstra
)	
Date Filed or 102(e) date:)	
October 31, 2003)	Washington, D.C.
)	
For: SAMPLING DEVICE AND METHOD)	
FOR OBTAINING SAMPLES OF)	
INTERNAL SUBSTANCES ...)	

DECLARATION OF SHERIDAN NEIMARK

Honorable Commissioner for Patents
U.S. Patent and Trademark Office
Randolph Building, Mail Stop Petitions
401 Dulany Street
Alexandria, VA 22314

Sir:

I, the undersigned Sheridan Neimark, hereby declare and state as follows.

I am a partner in the law firm of Browdy and Neimark, PLLC ("Browdy and Neimark"), and have been a partner in Browdy and Neimark since 1969.

I signed the transmittal letter filed in the above-identified application on October 31, 2003, which transmittal letter is submitted herewith as Exhibit A.

It is my usual practice before signing any such documents for filing in the Patent and Trademark Office to

review the document for correctness. Such documents are prepared by the Browdy and Neimark patent filing department for my review and signature.

Upon a recent review of the Browdy and Neimark file for this case, I noticed that two errors were made in the filing of October 31, 2003, which I failed to notice at the time that I reviewed the documents and signed them. It is apparent that the application should have been a national stage application of international (PCT) application PCT/SE02/00951, filed May 17, 2002. The papers that I signed are the type of papers that are normally used for a regular U.S. national application. Furthermore, it is apparent that the specification as filed did not include drawings, although drawings are referred to in the specification.

I do not have an explanation for why I did not notice these errors as I am usually very careful in reviewing such documents. A review of the file indicates to me that our employee Jennifer Udezue was the employee who prepared the documents. In my experience, she was a reliable employee and did not usually make such mistakes. In fact, I am aware of no other occasion where such a significant filing error was made.

I can only conclude that my failure to notice these errors at the time that I signed the transmittal letter of October 31, 2003, in this case was caused by human error and

is certainly an anomaly insofar as my practice of law is concerned.

I hereby further declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

May 2, 2006
Date

/SN/
Sheridan Neimark

Appln. No. 10/697,943
Petition Dated May 10, 2006

Appendix G

U.S. DEPARTMENT OF COMMERCE PATENT AND TRADEMARK OFFICE TRANSMITTAL LETTER TO THE UNITED STATES DESIGNATED/ELECTED OFFICE (DO/EO/US) CONCERNING A FILING UNDER 35 U.S.C. 371		ATTORNEY'S DOCKET NUMBER STOLTZ11
		U.S. APPLICATION NO. (If known, see 37 CFR 1.5) 10/697,943
INTERNATIONAL APPLICATION NO. PCT/SE02/00951	INTERNATIONAL FILING DATE 17 May 2002	PRIORITY CLAIMED 17 May 2001
TITLE OF INVENTION SAMPLING DEVICE AND METHOD FOR OBTAINING SAMPLES OF INTERNAL BODY SUBSTANCES AND METHOD FOR PRODUCING A SAMPLING DEVICE		
APPLICANT(S) FOR DO/EO/US Klas STOLTZ		
Applicant herewith submits to the United States Designated/Elected Office (DO/EO/US) the following items and other information: <ol style="list-style-type: none"> 1. <input checked="" type="checkbox"/> This is a FIRST submission of items concerning a filing under 35 U.S.C. 371. 2. <input type="checkbox"/> This is a SECOND or SUBSEQUENT submission of items concerning a filing under 35 U.S.C. 371. 3. <input checked="" type="checkbox"/> This is an express request to begin national examination procedures (35 U.S.C. 371(f)) at any time rather than delay examination until the expiration of the applicable time limit set in 35 U.S.C. 371(b) and PCT Articles 22 and 39(1). 4. <input checked="" type="checkbox"/> The US has been elected in a Demand by the expiration of 19 months from the priority date (PCT Article 31). 5. <input checked="" type="checkbox"/> A copy of the International Application as filed (35 U.S.C. 371(c)(2)) <ol style="list-style-type: none"> a. <input type="checkbox"/> is attached hereto (required only if not transmitted by the International Bureau). b. <input checked="" type="checkbox"/> has been communicated by the International Bureau. c. <input type="checkbox"/> is not required, as the application was filed in the United States Receiving Office (RO/US). 6. <input type="checkbox"/> An English language translation of the International Application as filed (35 U.S.C. 371(c)(2)). 7. <input checked="" type="checkbox"/> Amendments to the claims of the International Application under PCT Article 19 (35 U.S.C. 371(c)(3)) <ol style="list-style-type: none"> a. <input type="checkbox"/> are transmitted herewith (required only if not transmitted by the International Bureau). b. <input type="checkbox"/> have been communicated by the International Bureau. c. <input type="checkbox"/> have not been made; however, the time limit for making such amendments has NOT expired. d. <input checked="" type="checkbox"/> have not been made and will not be made. 8. <input type="checkbox"/> An English language translation of the amendments to the claims under PCT Article 19 (35 U.S.C. 371(c)(3)). 9. <input checked="" type="checkbox"/> An oath or declaration of the inventor(s) (35 U.S.C. 371(c)(4)). 10. <input type="checkbox"/> An English language translation of the annexes to the International Preliminary Examination Report under PCT Article 36 (35 U.S.C. 371(c)(5)). <p>Items 11. to 16. below concern document(s) or information included:</p> <ol style="list-style-type: none"> 11. <input type="checkbox"/> An Information Disclosure Statement under 37 CFR 1.97 and 1.98. 12. <input type="checkbox"/> An Assignment document for recording. A separate cover sheet in compliance with 37 CFR 3.28 and 3.31 is included. 13. <input type="checkbox"/> A FIRST preliminary amendment. <li style="padding-left: 40px;"><input type="checkbox"/> A SECOND or SUBSEQUENT preliminary amendment. 14. <input type="checkbox"/> A substitute specification. 15. <input type="checkbox"/> A change of power of attorney and/or address letter. 16. <input checked="" type="checkbox"/> Other items or information: <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Application Data Sheet. <input checked="" type="checkbox"/> Courtesy copy of International Application as filed. <input checked="" type="checkbox"/> Courtesy copy of the first page of the International Publication (WO 02/088630). <input checked="" type="checkbox"/> Courtesy copy of the International Preliminary Examination Report, there were no annexes. <input checked="" type="checkbox"/> Courtesy copy of formal drawings, 4 sheet, Figures 1-8. <input checked="" type="checkbox"/> Courtesy Copy of the International Search Report. <input checked="" type="checkbox"/> The application is (or will be) assigned to: FÄRGKLÄMMAN AB, whose address is Pyramidbacken 6, S-141 75 Huddinge, Sweden.. 		

U.S. APPLICATION NO. (If known, see 37 CFR 1.5)	International Application No. PCT/SE02/00951	Attorney's Docket No. STOLTZ11
-------------------------------------------------	--------------------------------------------------------	------------------------------------------

<p>17. [xx] The following fees are submitted: BASIC NATIONAL FEE (37 CFR 1.492 (a)(1) –(5): Neither international preliminary examination fee (37 CFR 1.482) nor international search fee (37 CFR 1.445(a)(2)) paid to USPTO and International Search Report not prepared by the EPO or JPO.....\$1080.00</p> <p>International preliminary examination fee (37 CFR 1.482) not paid to USPTO but International Search Report prepared by the EPO or JPO.....\$920.00</p> <p>International preliminary examination fee (37 CFR 1.482) not paid to USPTO but international search fee (37 CFR 1.445(a)(2)) paid to USPTO.....\$770.00</p> <p>International preliminary examination fee paid to USPTO (37 CFR 1.482) but all claims did not satisfy provisions of PCT Article 33(1)-(4).....\$730.00</p> <p>International preliminary examination fee paid to USPTO (37 CFR 1.482) and all claims satisfied provisions of PCT Article 33(1)-(4).....\$100.00</p> <p style="text-align: center;">ENTER APPROPRIATE BASIC FEE AMOUNT =</p> <p>Surcharge of \$130.00 for furnishing the oath or declaration later than [] 20 [] 30 months from the earliest claimed priority date (37 CFR 1.492(e)).</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:25%;">Claims as Originally Presented</td> <td style="width:15%;">Number Filed</td> <td style="width:15%;">Number Extra</td> <td style="width:15%;">Rate</td> <td style="width:15%;"></td> <td style="width:20%;"></td> </tr> <tr> <td>Total Claims</td> <td>32 - 20</td> <td>12</td> <td>X \$18.00</td> <td>\$ 216.00</td> <td></td> </tr> <tr> <td>Independent Claims</td> <td>3 - 3</td> <td>0</td> <td>X \$86.00</td> <td>\$</td> <td></td> </tr> <tr> <td colspan="4">Multiple Dependent Claims (if applicable)</td> <td>+\$290.00</td> <td>\$ 290.00</td> </tr> </table> <p style="text-align: center;">TOTAL OF ABOVE CALCULATIONS =</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:25%;">Claims After Post Filing Prel. Amend</td> <td style="width:15%;">Number Filed</td> <td style="width:15%;">Number Extra</td> <td style="width:15%;">Rate</td> <td style="width:15%;"></td> <td style="width:20%;"></td> </tr> <tr> <td>Total Claims</td> <td>- 20</td> <td></td> <td>X \$18.00</td> <td>\$</td> <td></td> </tr> <tr> <td>Independent Claims</td> <td>- 3</td> <td></td> <td>X \$86.00</td> <td>\$</td> <td></td> </tr> </table> <p style="text-align: center;">TOTAL OF ABOVE CALCULATIONS =</p> <p>Reduction of ½ for filing by small entity, if applicable. Applicant claims small entity status. See 37 CFR 1.27.</p> <p style="text-align: center;">SUBTOTAL =</p> <p>Processing fee of \$130.00 for furnishing the English translation later than [] 20 [] 30 months from the earliest claimed priority date (37 CFR 1.492(f)).</p> <p style="text-align: center;">TOTAL NATIONAL FEE =</p> <p>Fee for recording the enclosed assignment (37 CFR 1.21(h)). The assignment must be accompanied by an appropriate cover sheet (37 CFR 3.28, 3.31). \$40.00 per property +</p> <p style="text-align: center;">TOTAL FEES ENCLOSED =</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:60%;"></td> <td style="width:20%; text-align: center;">Amount to be:</td> <td style="width:20%; text-align: center;">\$</td> </tr> <tr> <td></td> <td style="text-align: center;">refunded</td> <td></td> </tr> <tr> <td></td> <td style="text-align: center;">charged</td> <td style="text-align: center;">\$</td> </tr> </table>	Claims as Originally Presented	Number Filed	Number Extra	Rate			Total Claims	32 - 20	12	X \$18.00	\$ 216.00		Independent Claims	3 - 3	0	X \$86.00	\$		Multiple Dependent Claims (if applicable)				+\$290.00	\$ 290.00	Claims After Post Filing Prel. Amend	Number Filed	Number Extra	Rate			Total Claims	- 20		X \$18.00	\$		Independent Claims	- 3		X \$86.00	\$			Amount to be:	\$		refunded			charged	\$	CALCULATIONS PTO USE ONLY
Claims as Originally Presented	Number Filed	Number Extra	Rate																																																	
Total Claims	32 - 20	12	X \$18.00	\$ 216.00																																																
Independent Claims	3 - 3	0	X \$86.00	\$																																																
Multiple Dependent Claims (if applicable)				+\$290.00	\$ 290.00																																															
Claims After Post Filing Prel. Amend	Number Filed	Number Extra	Rate																																																	
Total Claims	- 20		X \$18.00	\$																																																
Independent Claims	- 3		X \$86.00	\$																																																
	Amount to be:	\$																																																		
	refunded																																																			
	charged	\$																																																		

a. [] A check in the amount of \$_____ to cover the above fees is enclosed.

b. [X] Credit Card Payment Form (PTO-2038), authorizing payment in the amount of \$1080.00, for basic filing fee only, is attached. At this time no authorization is given to charge any additional fees relating to extra claims, etc. However, if a deficiency exists in the basic filing fee, please charge said deficiency in the filing fee to Deposit Account No. 02-4035.

c. [] Please charge my Deposit Account No. **02-4035** in the amount of \$_____ to cover the above fees.
A duplicate copy of this sheet is enclosed.

d. [] The Commissioner is hereby authorized to charge any additional fees which may be required, or credit any overpayment to Deposit Account No. **02-4035**. A duplicate copy of this sheet is enclosed.

NOTE: Where an appropriate time limit under 37 CFR 1.494 or 1.495 has not been met, a petition to revive (37 CFR 1.137(a) or (b)) must be filed and granted to restore the application to pending status.

SEND ALL CORRESPONDENCE TO: BROWDY AND NEIMARK, P.L.L.C. 624 NINTH STREET, N.W., SUITE 300 WASHINGTON, D.C. 20001 TEL: (202) 628-5197 FAX: (202) 737-3528 Date of this submission: May 10, 2006	_____ /rlb/ SIGNATURE Roger L. Browdy _____ NAME 25,618 _____ REGISTRATION NUMBER
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------

RLB:cdg

Appln. No. 10/697,943
Petition Dated May 10, 2006

Appendix H

Supplemental Application Data Sheet

Application Information

Application Number::	10/697,943
IA Filing Date::	17 May 2002
Application Type::	Regular
Subject Matter::	Utility
Suggested Classification::	
Suggested Group Art Unit::	
CD-ROM or CD-R?::	None
Number of CD Disks::	
Number of Copies of CDs::	
Sequence Submission?::	
Computer Readable Form (CRF)?::	
Number of copies of CRF::	
Title::	SAMPLING DEVICE AND METHOD FOR OBTAINING SAMPLES OF INTERNAL BODY SUBSTANCESAND METHOD FOR PRODUCING A SAMPLING DEVICE
Attorney Docket Number::	STOLTZ11
Request for Early Publication?::	No
Request for Non-Publication?::	No
Suggested Drawing Figure::	
Total Drawing Sheets::	0
Small Entity?::	No
Latin Name::	
Variety Denomination Name::	
Petition Included::	No
Petition Type::	
Licensed US Govt. Agency::	
Contract or Grant Numbers::	
Secrecy Order in Parent Appl.?::	No

Applicant Information

Applicant Authority Type::	Inventor
Primary Citizenship Country::	Sweden
Status::	Full Capacity
Given Name::	Klas
Middle Name::	
Family Name::	STOLTZ
Name Suffix::	
City of Residence::	Saltsjobaden
State or Province of Residence::	
Country of Residence::	Sweden
Street of Mailing Address::	Gokvagen 2A
City of Mailing Address::	Saltsjobaden
State or Province of Mailing Address::	
Country of Mailing Address::	Sweden
Postal or Zip Code of Mailing Address::	S-133 36

Correspondence Information

Correspondence Customer Number::	001444
----------------------------------	--------

Representative Information

Representative Customer Number::	001444
----------------------------------	--------

Domestic Priority Information

Application::	Continuity Type::	Parent Application::	Parent Filing Date::
---------------	-------------------	----------------------	----------------------

<u>This Application</u>	<u>National Stage of</u>	<u>PCT/SE02/00951</u>	<u>5/17/2002</u>
This Application	Appln claiming benefit under 35 USC 119(e)	60/301,254	06/28/01
<u>PCT/SE02/00951</u>			

Foreign Priority Information

Country::	Application Number::	Filing Date::	Priority Claimed::
Sweden	0101738-3	05/17/01	<u>yes</u>

Assignment Information

Assignee Name::	FARGKLAMMAN AB
Street of Mailing Address::	Pyramidbacken 6
City of Mailing Address::	Huddinge
State or Province of Mailing Address::	
Country of Mailing Address::	Sweden
Postal or Zip Code of Mailing Address::	S-141 75